

### **REMARKS**

This communication is responsive to the non-final Office Action mailed on March 3, 2006. Claims 1-17 are pending, claims 14-17 have been cancelled, and claim 3 has been withdrawn from consideration. Claim 1 has been amended. In view of the foregoing amendments, as well as the following remarks, Applicant respectfully submits that this application is in complete condition for allowance and requests reconsideration of the application in this regard.

#### **Rejections of Claims Under 35 U.S.C. § 102**

Claims 1, 2, 4, 6, 11, 12, 14, and 15 stand rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 2,873,069 to Matthews (hereinafter *Matthews*). Claims 14 and 15 have been cancelled. Claim 1 is the only remaining independent claim subject to this rejection. The Examiner contends that *Matthews* shows or teaches all the features of the rejected claims. Applicant respectfully traverses the Examiner's contention.

*Matthews* fails to disclose that the armature includes "a valve element having an opened position allowing adhesive flow through an annular gap between said valve element and said valve seat to said adhesive outlet and a closed position in which said valve element contacts said valve seat for preventing adhesive flow to said adhesive outlet," as set forth in Applicant's amended claim 1. Instead, *Matthews* discloses that, when the armature (42) is in the opened position (Fig. 3), the valve element (20) is completely withdrawn from chambers (12, 14). As a consequence, the flow path from chamber (12) to chamber (14) through the valve seat (18) is not annular or ring-shaped, but instead is disk-shaped because the liquid does not have to flow about the valve element (20). In order for a reference to anticipate a claimed invention, the reference

must teach each and every element in the precise arrangement set forth in the claim. If the reference fails to teach even one of the claimed features, the reference does not and cannot anticipate the claimed invention. Based upon the deficiency of *Matthews* identified in the preceding remarks, Applicant respectfully requests that this rejection be withdrawn.

Claim 1, as amended, is patentable for additional reasons. Specifically, *Matthews* fails to disclose “said plurality of windings of said electromagnetic coil being selectively energized for generating an electromagnetic field capable of moving said armature relative to said pole to move said valve element from said closed position to said opened position,” as set forth in Applicant’s amended claim 1. Instead, *Matthews* discloses at column 3, line 71 to column 4, line 6 that:

Following energization of winding 40, depression of the reset stem 48 causes enclosure 34 of hood assembly 32 to be moved against the bias of compression springs 46 and 66 to thereby position electromagnetic core element 38 in attracted relative position with respect to armature member 42. Such positioning of armature member 42 permits the electromagnetic effect of winding 40 to coupled core member 38 and armature member 42 in attracted relation due to passage of magnetic lines of force through said core member 38 and said armature member 42.

This passage from *Matthews* indicates that the energization of the winding (40) fails to move the armature member (42) relative to the core member (38). Moreover, the valve element (20) is lifted from the valve seat (18) to provide an opened position not as a result of energizing the winding (40) but, instead, as a result of the retraction of the reset stem (48). See *Matthews* at column 4, lines 35-44. For at least these additional reasons, Applicant respectfully requests that this rejection be withdrawn.

Claim 1, as amended, is patentable for yet additional reasons. Specifically *Matthews* fails to disclose “a nozzle coupled with the module body, said nozzle having an

adhesive outlet and a valve seat between said adhesive inlet and said adhesive outlet,” as set forth in Applicant’s amended claim 1. Instead, *Matthews* discloses that the module body represented by housing (24) is coupled with a fuel supply conduit (16) that bears a valve seat (18). *Matthews* also fails to disclose that the pole has “a fixed position relative to said module body.” Instead, *Matthews* discloses that the core member (38) is movable relative to the housing (24), as is apparent from a comparison of Figures 1 and 2 in *Matthews*. *Matthews* also fails to disclose “said plurality of windings being wrapped about substantially an entire length of said first arm and said second arm.” Instead, *Matthews* discloses that the winding (40) is only wrapped about a central region of each arm of the core member (38). For at least these additional reasons, Applicant respectfully requests that this rejection be withdrawn.

Because claims 2, 4, 6, 11, and 12 depend from claim 1, Applicant submits these claims are also patentable for at least the same reasons as claim 1. Furthermore, these claims recite unique combinations of elements not disclosed or suggested by *Matthews*.

### **Rejections of Claims Under 35 U.S.C. § 103**

Claims 7-10, 13, and 16 stand rejected under 35 U.S.C. § 103(a) as unpatentable over *Matthews* in view U.S. Patent No. 1,790,271 to Kouyoumjian (hereinafter *Kouyoumjian*). Claim 16 has been cancelled. *Kouyoumjian* fails to cure the deficiencies of *Matthews*. Because claims 7-10 and 13 depend from independent claim 1, Applicant submits that these claims are also patentable for at least the same reasons discussed above with regard to claim 1. Furthermore, these claims each recite a unique combination of elements not disclosed or suggested by this combination of references.

Claims 5 and 17 stand rejected under 35 U.S.C. § 103(a) as unpatentable over *Matthews* in view U.S. Patent No. 6,318,599 to Estelle et al. (hereinafter *Estelle*). Claim 17 has been cancelled. *Estelle* fails to cure the deficiencies of *Matthews*. Because claim 5 depends from independent claim 1, Applicant submits that this claim is also patentable for at least the same reasons discussed above with regard to claim 1. Furthermore, this claim recites a unique combination of elements not disclosed or suggested by this combination of references.

### **Conclusion**

Applicant has made a bona fide effort to respond to each and every requirement set forth in the Office Action. In view of the foregoing amendments and remarks, this application is submitted to be in complete condition for allowance and, accordingly, a timely notice of allowance to this effect is earnestly solicited. In the event that any issues remain outstanding, the Examiner is invited to contact the undersigned to expedite issuance of this application.

Applicant does not believe that any fees are due in connection with this submission. However, if such petition is due or any fees are necessary as a result of this communication, the Commissioner is hereby authorized to charge any under-payment or fees associated with this communication or credit any over-payment to Deposit Account No. 23-3000.

Respectfully submitted,  
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